

US EPA RECORDS CENTER REGION 5



445226

PRC Environmental Management, Inc.
644 Linn Street
Suite 719
Cincinnati, Ohio 45203
513-241-0149
Fax 513-241-0354

September 10, 1992

RECEIVED **PRC**
SEP 15 1992

(R)

Ms. Jeanne Griffin
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604

SITE ASSESSMENT SECTION

Re: Expanded Site Inspection - Carstab Corporation (Morton International, Inc.)
OHD 000724138

Dear Ms. Griffin:

As discussed in our telephone conversation on Thursday, September 4, all legal issues regarding access for the Expanded Site Inspection (ESI) at the Carstab Corporation site in Reading, Ohio appear to be resolved. U. S. Environmental Protection Agency (U.S. EPA) legal counsel has assured me that Morton International's counsel verbally consented to allow PRC and its subcontractors to access the site with their existing insurance coverage.

The site contact (Mr. Glenn Schaff) has confirmed that Monday, September 14 is an acceptable starting date for the monitoring well installation. (This was the earliest date that the drilling subcontractor could mobilize.) PRC anticipates completing the drilling and well development by Friday, September 18 and conducting the ground-water, soil, and sediment sampling the week of September 21.

Attached are a revised Sampling Plan (Table 1) and Sample Location Map (Figure 4) for the ESI Site Specific Implementation Plan (SSIP), originally submitted July 7, 1992. Also attached is an errata sheet modifying the text of the SSIP. The table, figure, and text have been modified to address comments submitted by OEPA on July 16, 1992 and to reflect changes recommended by U.S. EPA legal counsel. Although the Reading municipal well samples remain listed in the sampling plan, sampling of these wells was completed on July 22, 1992.

If you have any questions or comments regarding the Carstab ESI, please contact me at (513) 241-0149.

Sincerely,

Guy D. Montfort
Geologist

Attachments (3)

cc:

Laura Fay - OEPA Field Operations Officer
Amy Gibbons - OEPA-Southwest District Contact
Majid Chaudry - PRC Program Manager (without attachments)
Gabe Rood - PRC Project Manager
File

ERRATA SHEET

EXPANDED SITE INSPECTION (ESI) - SITE SPECIFIC IMPLEMENTATION PLAN (SSIP) CARSTAB (MORTON INTERNATIONAL) FACILITY READING, OHIO

Please note the following revisions to the Carstab ESI-SSIP, dated July 7, 1992.

Section 2.2.1 - Waste Disposal Practices

1. Page 6, Paragraph 3, third sentence. Replace the word "alkyl-benzene" with "chloral-benzene."

Section 2.2.2 - Regulatory History

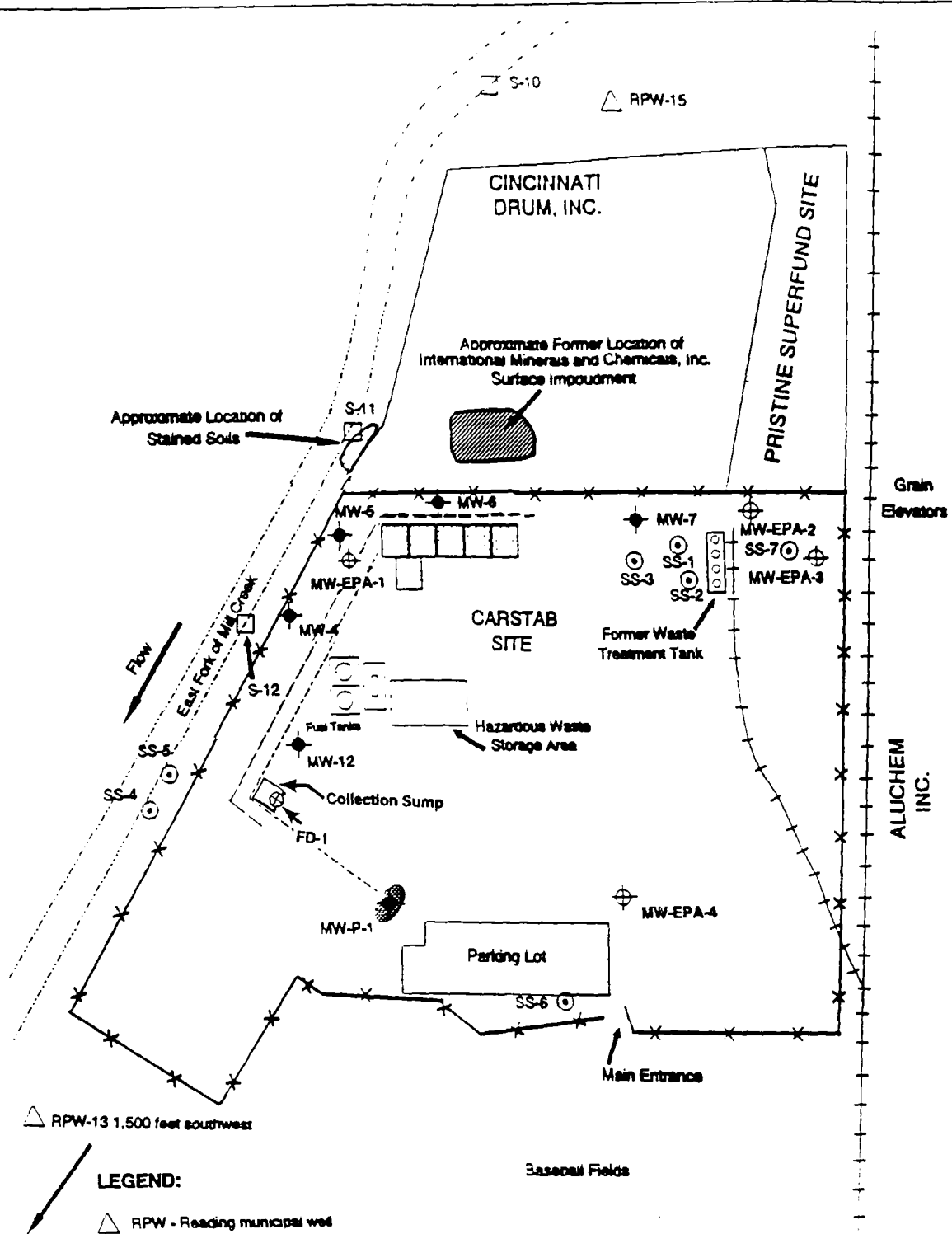
2. Page 8, Paragraph 1, first sentence. Replace the word "ordered" with "requested."
3. Page 9, Paragraph 1, second sentence. Replace the depth "9 feet" with the depth "7 feet."

Section 5.1.2 - Proposed Sampling Locations

4. Page 17, Paragraph 2, second sentence. This should read "Existing on-site wells and the ground-water collection system will also be sampled."
5. Page 17, Paragraph 3, first sentence. This should read "PRC anticipates installing four new ground-water monitoring wells . . ."
6. Page 17, Paragraph 3, fourth sentence. This should begin "One well (MW-EPA-1) will be installed approximately 40 feet west of where subsurface soil sample S-2 was collected during the 1990 SSI . . ."
7. Page 17, Paragraph 3. Delete the last sentence referring to MW-EPA-2.
8. Page 17, Paragraph 4, second sentence. This should begin "One of these (MW-EPA-2) will be installed in the northeast portion of the site . . ."
9. Page 17, Paragraph 4, third sentence. This should begin "Background well MW-EPA-3 . . ."
10. Page 17, Paragraph 4, last sentence. This should begin "The third well, MW-EPA-4 . . ."
11. Page 19, Paragraph 1, first sentence. This should read "Ground-water samples will also be collected from six existing monitoring wells and from the on-site ground-water collection system (french drain)."
12. Page 19, Paragraph 1. Add the following sentences to the end of the paragraph. "The ground water in the french drain will be sampled. The sample (FD-1) will provide information regarding the nature of contaminants present in site ground water."

Section 6.0 - Field Work Summary

13. Page 24, Paragraph 5, first sentence. Revise the proposed field work dates to September 14-24, 1992.



LEGEND:

- △ RPW - Reading municipal well
- ⊙ SS - Surficial soil sampling location
- S - Sediment sampling location
- MW - Existing ground-water monitoring well
- ⊕ MW-EPA - Proposed ground-water monitoring well
- Ground-water collection system
- Slurry wall
- × Chain-link fence
- Former Carstab surface impoundments
- Former swale
- Conrail Railroad
- ⊕ Ground-water collection system sample location

Baseball Fields

0 125' 250' 375' 500'

SCALE: 1" = 250'

CARSTAB CORPORATION
CINCINNATI, OHIO

FIGURE 4
SAMPLE LOCATION MAP

EMC ENVIRONMENTAL MANAGEMENT, INC.

SOURCE: Modified from U.S. EPA, 1991

TABLE 1
SAMPLING PLAN

MEDIUM	SAMPLE	LOCATION AND OBJECTIVE
Ground Water (See Figure 4 for ground-water sample locations.)	MW-EPA-1	Former Surface Impoundment Area - This well will be installed approximately 40 feet west of where the FIT team collected soil sample S-2 in 1990. The purpose will be to determine if contaminants have migrated from soils to ground water in the suspected source area.
	MW-EPA-2	Background - The purpose of this well is to evaluate background conditions in the northern part of the site and to evaluate the potential migration of contaminants from Pristine onto the Carstab site.
	MW-EPA-3	Background - The purpose of this well is to evaluate background conditions for ground water as it enters the eastern portion of the site.
	MW-EPA-4	Background - The purpose of this well is to evaluate background conditions for ground water in the vicinity of the former swale.
	FD-1	A ground-water sample will be collected from the sump that the on-site ground-water collection system (french drain) flows into. This sample will provide general information regarding the types of contaminants present in ground water.
	MW-P-1	A ground-water sample will be collected from the pumping well in the former swale area. The purpose of this sample will be to evaluate contaminant levels, relative to appropriate background, in this suspected source area.
	MW-4	A ground-water sample will be collected from existing monitoring well MW-4. The purpose will be to evaluate ground-water quality at the downgradient site boundary.

TABLE 1 (continued)

SAMPLING PLAN

Ground Water (continued)	MW-5	A ground-water sample will be collected from existing monitoring well MW-5, located in the northwest portion of the site. The purpose of this sample is to evaluate conditions downgradient from the former surface impoundments, outside of the ground-water collection system. This data will also be useful in assessing potential ground-water discharge to the banks of Mill Creek.
	MW-6	A ground-water sample will be collected from existing monitoring well MW-6. The purpose of this sample is to evaluate the potential migration of contaminants from Cincinnati Drum onto the Carstab site, or the potential for contaminant migration off site from the surface impoundments.
	MW-7	A ground-water sample will be collected from existing monitoring well MW-7. The purpose will be to evaluate ground-water quality directly upgradient from the former surface impoundments. Sample data will also be useful in determining if other on-site source areas exist in the northeast portion of the site (i.e. former waste treatment tanks).
	MW-12	A ground-water sample will be collected from existing monitoring well MW-12. The purpose will be to evaluate ground-water conditions at the hydraulic downgradient site boundary.
Ground Water (QA/QC)	MW-1B	An equipment rinsate blank sample will be prepared to demonstrate the effectiveness of decontamination procedures and to evaluate potential effects of the sampling equipment, containers and sampling environment on the analytical results.
	MW-EPA-6	A field duplicate sample will be prepared at one of the sampling locations. The sample will be used to demonstrate homogeneity of samples and the potential effects of the sampling environment and techniques on analytical reproducibility.

TABLE 1 (continued)

SAMPLING PLAN

Ground Water (QA/QC - continued)	MW-EPA-2MSD	A matrix spike/matrix spike duplicate sample will be prepared. The purpose of this sample will be to allow analytical evaluation of the effects of the sample matrix on analytical reproducibility.
	TB-1	A trip blank will accompany each cooler containing VOC vials to evaluate potential effects of sample containers, preservatives, and the sampling environment on the VOC analyses.
Municipal Wells (See Figure 5 for municipal well sample locations.)	RPW-13	Municipal well sample RPW-13 will be collected from Reading Well No. 13, located in Koenig Park, south of Carstab. Well No. 13 has exhibited VOC concentrations above MCLs.
	RPW-15	A water sample (RPW-15) will be collected from Reading Well No. 15, Reading's highest production well.
Municipal Wells (QA/QC)	RPW-13D	A duplicate sample will be prepared at one of the sampling locations. The sample will be used to demonstrate homogeneity of samples and the potential effects of the sampling environment and techniques on analytical reproducibility.
	RPW-13MSD	A matrix spike/matrix spike duplicate sample will be designated. The purpose of this sample will be to allow analytical evaluation of the effects of the sample matrix on analytical reproducibility.
Sediment (See Figure 4 for sediment sample locations.)	S-10	One sediment sample will be collected to evaluate background conditions. The sample will be collected from the east bank of Mill Creek, adjacent to the City of Reading's north wellfield (upstream from Carstab and Cincinnati Drum).
	S-11	This sample will be collected at the location where discolored seepage was observed, on the east bank of Mill Creek, approximately 50 feet north of the Carstab/Cincinnati Drum property line (on Cincinnati Drum property). The purpose of this sample is to document the nature of this precipitate material and possibly document a release to surface water from ground water.

TABLE 1 (continued)

SAMPLING PLAN

Sediment (continued)	S-12	This sediment sample will be collected from the east bank of Mill Creek, approximately 500 feet south (downstream from) the Carstab/Cincinnati Drum property line (on the Carstab property). The purpose of this sample will be to determine if contaminants are being released to Mill Creek from shallow ground water further south on the Carstab site. Also, the analytical results will be compared to those for Sample S-11, to facilitate attribution of the observed seepage near the Carstab/Cincinnati Drum property line.
Sediment (QA/QC)	S-11D	One of the sediment samples will also be designated for duplicate analyses. The sample will be used to demonstrate homogeneity of samples and the potential effects of the sampling environment and techniques on analytical reproducibility.
	S-12MSD	One of the sediment samples will also be designated for matrix spike/matrix spike duplicate analyses, to allow analytical evaluation of the effects of the sample matrix on analytical reproducibility.
Soil (See Figure 4 for soil sample locations.)	SS-1 to SS-3	Surficial soil samples SS-1, SS-2 and SS-3 will be collected from the same general area that soil sample S-4 was collected during the 1990 SSI. The purpose of these samples will be to determine whether contamination is present.
	SS-4 and SS-5	Surficial soil samples SS-4 and SS-5 will be collected from the temporary fill storage area located between Mill Creek and the western site fence. The purpose will be to identify a potential soil contamination source area.
	SS-6 and SS-7	Surficial soil samples SS-6 and SS-7 will be collected to evaluate background conditions. SS-6 will be collected in an unpaved area just inside the main gate (northwest of the guard shack). SS-7 will be collected in an unpaved area in the northeast portion of the site.

TABLE 1 (continued)

SAMPLING PLAN

Soil (QA/QC)	SS-1D	One of the soil samples will also be designated for duplicate analyses. The sample will be used to demonstrate homogeneity of samples and the potential effects of the sampling environment and techniques on analytical reproducibility.
	SS-2MSD	One of the soil samples will also be designated for matrix spike/matrix spike duplicate analyses. The purpose of this sample will be to allow analytical evaluation of the effects of the sample matrix on analytical reproducibility.